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December 18, 2024

VIA ECF

Hon. Sarah Netburn
United States Magistrate Judge
United States District Court
Southern District of New York
United States Courthouse
500 Pearl Street,
New York, N.Y. 10007-1312

Re: ***Saunders v. Royal Leaf Club Dispensary Corp.***
Case No. 1:24-cv-06208 (JMF) (SN)
Letter Motion for Extension of Time to File for Default

Dear Judge Netburn:

Our office represents Plaintiff, Michael Saunders ("Plaintiff") in the above-referenced Americans with Disabilities Act ("ADA") matter against Defendant, Royal Leaf Club Dispensary Corp. ("Defendant"). We write to respectfully request that this Honorable Court issue an Order, extending the time to initiate default judgment proceedings for an additional 15 days, pursuant to Rule 6(b) of the Federal Rules of Civil Procedure, which allows the court to grant an extension for good cause.

In our efforts to resolve this matter, on December 17, 2024, our staff called Defendant's business located at 107-27 71st Ave., Forest Hills, New York 11375, using the posted telephone number (718) 441-6807 and spoke with an individual who identified himself as Mr. Bashir Alsaedi. Mr. Alsaedi informed staff that he was the owner of the company and its website; that he had not been aware of the pending lawsuit; and after explaining the Default Judgment protocol, Mr. Alsaedi was extremely adamant that he have an opportunity to read the relevant documents and retain counsel. Our office has since provided Mr. Alsaedi copies of the relevant documents via email.

To provide the Defendant with an adequate opportunity to respond, we propose allowing them an additional 15 days to review the relevant documents and retain counsel, which would extend their time to answer to January 3, 2024. Should the Defendant fail to do so after this period of time, we will proceed to initiate default judgment proceedings as required under Rule 55 of the Federal Rules of Civil Procedure.

We sincerely apologize for any inconvenience this extension request may cause and appreciate the Court's understanding and consideration in this matter.



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